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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

MARK I. SOKOLOW et al., : 04-CV-00397 (GBD)(RE)

Plaintiffs,

-against-

NOTICE OF MOTION

ECF CASE

THE PALESTINIAN LIBERATION ORGANIZATION, $\,:\,$

et al,

Defendants.

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PLEASE TAKE NOTICE that, upon the annexed declarations of Stephen Mitchell dated September 6, 2011, Nicola Cain, dated September 6, 2011, Itai Maytal, dated September 6, 2011, and Louise Sommers dated September 6, 2011, the accompanying Memorandum of Law, the Subpoena to Testify at a Deposition in a Civil Action dated August 9, 2011 (Exhibit "A" to Declaration of Nicola Cain), and all prior proceedings, the undersigned will move this Court before the Hon. George Daniels, U.S.D.J. at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007-1312, as soon as counsel can be heard, for an Order, pursuant to Rule 45(c)(1) and (c)(3) of the Federal Rules of Civil Procedure, quashing the Subpoena issued by Plaintiffs Mark I. Sokolow *et al.* to The British

Broadcasting Corporation, and granting such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that opposing affidavits and memoranda of law, if any, must be served upon the undersigned pursuant to stipulation by September 22, 2011 and must be filed with the Court in accordance with applicable rules.

Dated: New York, New York

September 8, 2011

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Page 2 of 2

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